

Pet Medications Workshop
Project No. P12-1201
(regarding HR 1406)

The passing and subsequent regulation by the FTC of HR 1406 would be a travesty not only for our veterinary patients but for consumers as well as the veterinary profession as a whole.

First, there is no need for federal legislation requiring veterinarians to let clients know that they have a choice in filling prescriptions: the clients already know this. Millions of advertising dollars are spent to inform the clients of this on television, in newspapers and magazines, and online. This legislation would be redundant information and a waste of time, money and energy.

Second, and MOST important, our veterinary patients' welfare would be horribly and negatively affected. Human pharmacists are not trained in veterinary pharmacology. They do not understand that the bioavailability of drugs is different in different species. The pharmacokinetics can be vastly different among different species. There are also differences in the bioavailability between the human formulation of a drug versus the veterinary formulation of that same drug. My clients trust that I know this information and it is not my job to train human pharmacists. I don't have time to teach veterinary pharmacology to them, nor should I assume the liability for their lack of knowledge. We, as veterinarians, are educated and trained to deal with many different species and hundreds of breeds within those species. We are the experts in veterinary pharmacology. We are the only ones educated and licensed to prescribe, use and dispense drugs to veterinary patients. I foresee a catastrophic domino effect, where prescriptions are filled incorrectly (wrong dosage, wrong drug, wrong formulation of drug, wrong instructions, counterfeit drug, etc), pets either get sick or sicker, more veterinary visits are required, clients spend more money on exams, tests, surgeries, etc and then because of this, the client ends up with a dead pet because now they can't afford any type of treatment. This scenario is very real and only serves as a disservice to all pets and their owners. This bill is just another attempt at big business pharmacies to practice veterinary medicine. I am licensed to practice veterinary medicine, they are not! I had another incident just recently where the wrong prescription was filled at a human pharmacy and my patient almost died.

Third, all veterinary costs will rise. As a small business owner, I am being squeezed with all regulation. I incur all federal, state and local cost increases. When there is a tax increase or other increases in the "costs of doing business", it is the small business owner who has to pay. Large corporations, non-profits, churches, etc are all excused from the majority of new legislative costs. Yes, part of my profit margin comes from drug sales. It is simple economics; in order to stay in business, I must make a profit. My practice supports 20 employees and their families. If this bill is passed, one of two things will happen and neither of these will be good for patient or clients. Either veterinary practices

will go out of business (where will that leave the client and patient who need help?) or veterinary costs for other services will skyrocket (again, terrible for the client and our patients). The way that we can keep costs low for the client is to spread the profit center over various services and products. I am very conscious of the costs to my clients. I am not out to gouge anyone with pricing. I have held my fees to very reasonable amounts, despite the ever-increasing cost of drugs and supplies. I am aware that my clients make decisions based on economics.

Fourth, making us take the time to write out prescriptions, instead of spending that time filling those prescriptions and getting immediate help to our patients is a waste of time and only hurts the pets. I can begin treatment in the exam room with the first dose administered, and specifically make sure that the client understands the instructions and to let them know that I am available if they have any questions about the drug, side effects, etc. Statistically, 20-30% of people who see a human doctor and get a prescription never actually go and have that prescription filled. They are adults and that is certainly their choice, but my patients cannot speak for themselves. If my clients take home a filled prescription, the compliance level increases exponentially. This helps my patients and that is why I studied veterinary medicine in the first place- to help pets. I know the prescription was filled and done so correctly, and I know my clients understand all instructions and I am able to follow up with them, in a timeline that I know to be true, to see how the medication is working for their pet. A study done in 2010, with Kaiser Permanente of Northern California enrollees indicated that only 5% of those patients did not fill their prescriptions because the patients were able to fill their prescriptions immediately and at the same location as their doctor's office. This is exactly like the veterinarian's office- immediate filling and without the hassle of dropping off the script, waiting 2-4 hours and then going back to pick it up or ordering online and waiting days to receive the needed medications. I often have clients tell me that they wished I was their doctor and that human medicine was more like veterinary medicine.

The human healthcare system is broken. Don't make veterinarians part of that system. Studies indicate that over 45 million prescriptions are filled incorrectly each year. 41% of those mistakes are due to problems with written or verbal communication. I don't have those problems when I fill a prescription in my facility. The other reasons that mistakes are made are due to overworked, stressed pharmacists who work long hours to fill hundreds of prescriptions per day. Adding veterinary prescriptions to that work log will hurt both human and animal patients. On top of that, factor in that their lack of veterinary pharmacology knowledge will lead to many more mistakes.

I have large veterinary drug companies that stand behind their drugs and support my clients, my patients and me if anything adverse should occur. When drugs are filled by some other means, I have no idea where that drug originated and no support system in place to help and that sets me up for increased liability and will increase my malpractice insurance, thus increasing all veterinary costs to the client.

It is your mission to prevent business practices that are anticompetitive, deceptive or unfair to consumers. Our veterinary industry is none of those things. It is my mission to

do what I can to protect my patients. I will not take the responsibility of causing my patients harm when I had no control over the drugs that they are taking (or not taking). We cannot afford to take on the liability of a prescription not filled in our facility under our supervision. This system has worked for many decades and our patient care has only gotten better, while the human healthcare system is horrid. Our system works for both the consumer and the patient. Costs are extremely low for the same services compared to human medicine, and the care is excellent, timely and effective. I have seen many changes in my 20 years of veterinary practice, but this bill and potential federal regulation is the most ludicrous and potentially damaging, toxic suggestion yet. If you want to give pets a fighting chance of survival, do not allow this to continue. No, my patients don't pay the bill, but they will pay the price if this regulation goes into effect. The future that you will create by allowing this bill to pass and agreeing to regulate it will be devastating. Attorneys and crematoriums will be getting very rich but you will leave the veterinarians (one of the most beloved professionals) having to witness the relinquishment, euthanasia or abandonment of many pets and watching that human-animal bond dissolve. Economically, people will not be taking care of their pets because they won't be able to afford it or won't have a place to seek help, because practices went out of business.

The FDA has noted on their website that up to 40% of all online medications can be counterfeit. I get my drugs from reputable vendors and veterinary drug companies so I know what I am getting and distributing to my patients. Giving my clients a written prescription will tell them that I approve of them taking the risk to put their pet's care in the hands of someone not educated or licensed to practice veterinary medicine. They trust me to advise them of the proper treatment and this is NOT it. They know they have options and when it is appropriate and safe, I offer other sources of medications, but forcing me to do something that I don't agree is safe or appropriate is a trust issue for me. And when something goes terribly wrong, and it will, my client will feel betrayed.

In summary, there are several risks that will be incurred with prescription portability. Some of which are:

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Counterfeit drugs
- Pets not getting needed medication (non filled prescriptions)
- Pets not getting medications in a timely manner
- Pets getting wrong medication
- Pets not getting veterinary formulation of certain drugs
- Consumers being given wrong information about drugs from individuals not educated in veterinary pharmacology (this results in huge risks to patients)
- Pharmacists changing prescriptions or incorrectly filling prescriptions and liability falling to the veterinarian, thus increasing overall costs to consumers and pets suffering because of it
- The failure of veterinary small businesses due to increased cost of day to day operation dealing with outside pharmacies on a regular basis and dealing with increased liability
- Practicing of veterinary medicine by people not educated or licensed to do so
- Consumers' loss of trust in veterinary medicine and the veterinarian

Increase in veterinary costs to the consumer
Loss of jobs in the veterinary industry

To me, practicing veterinary medicine is a privilege that I take very seriously. It has always been about what is best for the patient and the owner. I form partnerships with the client and together we decide what is best for the pet. Don't force me to do something that I don't believe to be in the patient's or client's best interest. Let us decide together on our own terms as it has always been. Keep the practice of veterinary medicine with the veterinarian. Don't put our patients in the hands of pharmacists who have no knowledge of veterinary pharmacology. The lay consumer will not understand the difference and therefore the risks of this. It is our professional responsibility to stop this regulation.

Sincerely,

Kaye Wigginton, DVM